

1 **SAO**
2 GARG GOLDEN LAW FIRM
3 ANTHONY B. GOLDEN, ESQ.
4 Nevada Bar No. 9563
5 CHARLES J. LEE, ESQ.
6 Nevada Bar No. 13523
7 3145 St. Rose Parkway, Suite 230
8 Henderson, Nevada 89052
9 Tel: (702) 850-0202
10 Fax: (702) 850-0204
11 Email: agolden@garggolden.com
12 Email: clee@garggolden.com

13 Counsel for Defendant

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 DAVID LARITA-AREOLA, JYRO REMANES,
17 ANTHONY BUMCROT, JONATHAN CRUZ,
18 MIRA MUNIZ, EDUARDO REYES, DANIAL
19 BRIDGES, STEPHANIE MARSHALL, JASON
20 COX, MATTHEW CARABALLO, ANDREW
21 JONES, DEVIN MARTY, MERSADIES
22 GRAVES, AMY MORENO, ANTONIO
23 ROBERTO RIOS, JASE RIOS, ALAN MILES,
24 RICKY WOLFINBARGER, CAMERON
25 KEANE, DEREK HALLBERG, CARLOS
26 FRANCISCO MARTINEZ, DIMITRIUS
27 OLLARVIA, JOSHUA RIOS, JASMINE
28 JONES, JESSE ROMERO, NICK RINALDO,
ANGELICA CANELA, MICHAEL
RODRIGUEZ, ALEXANDER BROWN,
BAILEY KEIBLER, BRANDON
CALDERONE, DYLAN DUGGINS, DULAL
WOODS, JULIO ANCHONDO, SONYA
GUERRERO, RIDGE JACOB, KAZU
VILLIATORA, KIMBERLY BATIE, KYLE
CHRISTOPHER, STEVEN ERVIN,
NICHOLAS LEMOINE, DEVEN MYERS and
DEBORAH WALKER,

Plaintiffs,

vs.

VEGAS VALLEY GROWERS, LLC, a Nevada
Limited Liability Company; JCL GROUP, LLC,
a Nevada Limited Liability Company and JCL
GROUP, LLP, a Nevada Limited Liability
Partnership,

Defendants.

CASE NO.: 2:20-cv-02106-BMN-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

(First Request)

1
2 Plaintiffs DAVID LARITA, et al (“Plaintiffs”) and Defendant VEGAS VALLEY
3 GROWERS, LLC (“Defendant”), by and through their counsel of record hereby STIPULATE
4 AND AGREE that the current discovery cutoff date of August 25, 2021, be continued for a period
5 of ninety (90) days up to and including November 23, 2021. This is the first extension to the
6 discovery period that has been requested in this matter.

7 This request has been necessitated by the difficulties faced with the multitude and
8 cumbersome amount of paper documents to review, this litigation being conducted during the
9 COVID pandemic (which added to the time necessary to review said paper documents), and
10 scheduling conflicts that prevent completion of discovery as scheduled. Specifically, Defendant’s
11 counsel was preparing for two trials, one that was to be litigated in United States District Court,
12 District of Nevada scheduled to begin July 12, 2021, and the second trial set to begin Trial in
13 Eighth Judicial District Court, Clark County, Nevada beginning on August 23, 2021.

14 **1. DISCOVERY COMPLETED TO DATE:**

15 Plaintiffs and Defendant each made their initial disclosures required under Fed. R. Civ. P.
16 26(a)(1)(A). Plaintiffs propounded written discovery on Defendant. Defendant’s extensive
17 amount of paperwork and employment records are being reviewed in order to respond to the
18 Plaintiffs’ Request for Production of Documents.

19 **2. DISCOVERY YET TO BE COMPLETED**

20 Defendant intends to serve written discovery requests upon Plaintiffs as well as depose
21 multiple Plaintiffs to be determined prior to the close of discovery. Plaintiff also would like to
22 depose individuals determined once further discovery has been completed by the parties.

23 **3. REASONS WHY REMAINING DISCOVERY HAS NOT YET BEEN**
24 **COMPLETED:**

25 Discovery has not been completed due to the reasons stated above as well as the limited
26 shutdown of operations due to the COVID-19 coronavirus, which has affected law firms,
27 governmental agencies, and the courts, has slowed down the discovery process in this case. Work
28

has proceeded on this case throughout the shutdown period, but it has proceeded more slowly than it would have during ordinary times.

4. REVISED DISCOVERY PLAN:

1. Discovery Cut-Off Date: **November 23, 2021.**

2. Dispositive Motions: The date for filing dispositive motions shall be not later than **January 7, 2022**. This date is 45 days after the new discovery cut-off date.

3. In the event that the discovery period is extended from the discovery cut-off date set forth in this Stipulation and Order to Extend Discovery, the date for filing dispositive motions shall be extended for the same duration, to be not later than 45 days from the subsequent discovery cut-off date.

4. Pretrial Order: The date for filing the joint pretrial order shall be not later than **January 28, 2022**, 21 days after the date set for filing dispositive motions. In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 21 days after decision on the dispositive motions or until further order of the court.

5. Additional Extensions of the Discovery Period: The last day for the parties to file their Motion and/or Stipulation to Extend Discovery shall be **November 2, 2021**, 21 days prior to the revised discovery cut-off.

6. Any discovery deadline not extended in accordance with the Revised Discovery Plan set forth above shall remain controlled by the Stipulated Discovery Plan and Scheduling Order (ECF No. 10), as approved by the Court on April 14, 2021.

DATED this 6th day of July 2021

DATED this 6th day of July 2021.

LAW OFFICES OF MICHAEL P. BALABAN

GARG GOLDEN LAW FIRM

By /s/Michael P. Balaban
MICHAEL P. BALABAN, ESQ.
Nevada Bar No. 9370
10726 Del Rudini Street
Las Vegas, Nevada 89141
(702) 586-2964
Counsel for Plaintiffs

By /s/ Charles J. Lee
CHARLES J. LEE, ESQ.
Nevada Bar No. 13523
3145 St. Rose Parkway, Suite 230
Henderson, Nevada 89052
(702) 850-0202
Counsel for Defendant

ORDER

FOR GOOD CAUSE APPEARING, IT IS SO ORDERED.

DATED this 6th day of July 2021.


UNITED STATES MAGISTRATE JUDGE

Submitted by:

GARG GOLDEN LAW FIRM

By /s/ Charles J. Lee
Anthony B. Golden, Esq.
Nevada Bar No. 9563
Charles J. Lee, Esq.
Nevada Bar No. 13523
3145 St. Rose Parkway, Suite 230
Henderson, Nevada 89052
(702) 850-0202
Counsel for Defendant